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11 *Attorneys for Defendants*

12 **IN THE UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 STEVEN RINGELBERG,  
15

16 Plaintiff,

17 v.

18 VANGUARD INTEGRITY  
PROFESSIONALS - NEVADA, INC., a  
19 Nevada corporation, VANGUARD  
INTEGRITY PROFESSIONALS, INC., a  
20 Nevada corporation; DOES 1-10; and ROE  
ENTITIES 11-20,

21 Defendants.  
22

Case No.: 2:17-cv-01788-JAD-PAL

**STIPULATION AND ORDER  
REGARDING SETTLEMENT AND STAY  
OF LITIGATION**

23  
24 On March 29, 2019, Steven Ringelberg (the “Plaintiff”), and Vanguard Integrity  
25 Professionals – Nevada, Inc., Vanguard Integrity Professionals, Inc. (collectively, the  
26 “Defendants”), submitted a Joint Status Report stating that the parties reached the economic terms  
27 of settlement. ECF No. 207. Consistent with the Joint Status Report, the Parties continue to  
28

1 negotiate settlement terms in good faith. The Parties are close to settlement but need additional  
2 time to finalize all terms.

3 **THEREFORE**, the Parties, by and through their undersigned counsel, stipulate and agree  
4 as follows:

5 1. The Parties shall have until April 23, 2019, to advise this Court of the final  
6 settlement between the Parties.

7 2. The stipulation and order for dismissal shall be submitted to this court ten (10) days  
8 after April 23, 2019.<sup>1</sup>

9 3. If the Parties are unable to reach a final settlement, the Parties' Proposed Pre-trial  
10 Orders shall be submitted no later than April 30, 2019.

11 **RESPECTFULLY SUBMITTED** this 18th day of April, 2019.

12  
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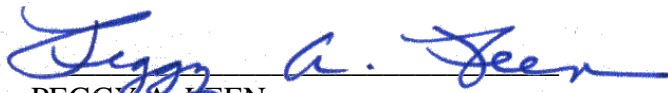
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22 *Attorneys for Plaintiff*

23 **IT IS SO ORDERED.**

24   
25 PEGGY A. LEEN  
26 UNITED STATES MAGISTRATE JUDGE

27 Dated this 26th day of April, 2019.

28 <sup>1</sup> Based on Mr. Ringelberg's rights under the Age Discrimination in Employment Act of 1967 ("ADEA") and the Older Workers Benefit Protection Act ("OWBPA") (the "Acts"), the Parties choose to allow the Defendants ten (10) days to effectuate the settlement payment.